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March 19, 2021

By ECF

The Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

*The Jury Coordinator is requested to
provide answers to the questions
as ordered*

Paul Maffey
CR 472
Re: *United States v. Salvatore Tagliaferro, et al.*
19 Cr. 472 (PAC)

Dear Judge Crotty:

We represent Defendant Salvatore Tagliaferro in the above-referenced matter and write jointly with the Government to request that this Court direct the Clerk of the Court of the Southern District of New York to provide the parties with additional records related to the composition of the Petit Jury venire to be used in this case.

The records sought relate to the three cases presently engaged in trial in this District: United States v. Weigand & Akhavan, 20 Cr. 188 (JSR) (SDNY), United States v. Ramirez, 15 Cr. 379 (PKC) (SDNY); and United States v. Alan Kaufman, 19 Cr. 504 (LAK) (SDNY).

For these three cases the parties jointly seek:

- The Juror Number only (and not Name or Street Address) for persons selected as potential trial jurors in each case;
- The juror qualification and summons forms for persons summoned to potentially become trial jurors in each case;
- The disposition of each summoned potential trial juror in each case as to excusal, deferment, disqualification or selection as described in the Jury Plan; and
- The Supplemental Juror Questionnaire for all persons summoned to potentially become trial jurors in each case.

We respectfully submit that the above information is necessary to conduct a thorough and effective evaluation of whether Mr. Tagliaferro has a basis to raise a fair cross-section challenge

The Hon. Paul A. Crotty
March 19, 2021
Page 2 of 2

to his upcoming Petit Jury venire and for the Government to formulate its response.

As always, we thank Your Honor for his time and consideration.

Respectfully submitted,

/S/

Michael K. Bachrach
Richard H. Rosenberg
Attorneys for Defendant Salvatore Tagliaferro

cc: All parties of record (by ECF)